corresponding relationship between the first identifier and the second identifier which is included in the answer.

Because the registering is performed with data included in the answer, the registering is performed in response to receiving an answer. The answer is in response to the interrogation request message forwarded by the server.

Therefore the registering in the server in applicant's claimed invention is performed in response to the server transferring an interrogation request and receiving an answer.

This is different in both Mori and Finn. Mori teaches registering in response to the client sending a registration request. Mori, col. 8 lines 20-24, "Network topology table 11 stores for each registration requesting node a set of port numbers ..." Fig. 10 B of Mori and col. 9 starting at line 65 describes the registration request packet.

Applicant claims "registering a corresponding relationship ... which is included in the answer" whereas Mori teaches registering the relationship which is included in a registration request message.

Thus Mori is different because a node sends a registration request packet to the server and the server registers the node with the information in the registration request packet, whereas applicant claims the registering is performed after receiving the answer from an interrogation request sent by the server. In applicant's claimed invention it is the server that sends an interrogation request (transferring step), whereas in Mori it is the node that sends a registration request.

Finn suggests that the LE server <u>does not</u> register the corresponding relationship that is not previously registered. Finn use the LE Client and Proxy flag so that LE Clients may act as a proxy for unregistered LAN destination (cite sections below).

First the Proxy can join with one MAC address through the JOIN procedure (sections outlined below). The JOIN procedure is different from applicant's invention for the same reasons as MORI. In the JOIN procedure the LE Client initiates the registration unlike

2

applicant where the registration is in response to a reply message.

Second there is no suggestion that the LE Server, in receiving a response from the LE Client to a ARP, registers the unregistered information. In fact Finn suggest that the LE Client continues to serve as the proxy and wishes to receive LE ARP requests for non-registered LAN destinations (cite below).

Finn describes that the LE Server will forward ARP's for unregistered LAN destination to client joined as proxy agents and the LE Client MUST NOT respond to any LE\_ARP\_REQUEST if it has not completed the "Join procedure" (page 2, section 6.1.3 of ATM Forum 94-0527).

The "Address Resolution Protocol" taught by Finn on page 5, section 6.2.8 of ATM\_forum 94-0527, discloses that an LE Server MUST forward any Le\_ARP\_REQUEST for an unregistered LAN destination to all LE Clients that successfully joined as proxy agents. The LE Server MAY also forward that LE\_ARP\_REQUEST to other LE Clients, as well. The LE Client MUST NOT respond to any LE\_ARP\_REQUEST if it has not completed the "Join procedure" (page 2, section 6.1.3 of ATM, Forum 94-0527).

The "Join procedure" is described in "Join Protocol" of "ATM Forum 94-0526" enclosed herewith. The "ATM\_Forum 94-0526" was filed with the USPTO in an IDS when the reissue application was filed.

In the "Join protocol" Finn discloses in table 1, offset 14, page 3 of ATM\_Forum 94-0526, that: "Proxy flag: LE Client serves non-registered MAC addresses and therefore wishes to receive LE ARP requests for non-registered LAN destinations" and the LE Client registers one MAC address with the LE Server as a result of joining the emulated I.AN (see page 6, section 4.3 of ATM\_Forum 94-0526).

Thus, the above two references neither disclose nor suggest that the LE Client registers an unregistered (non-registered) LAN destination with the LE Server or registers one MAC address with the LE server after the LE Client has joined the LE server. 11153133.01

Respectfully submitted,

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## **CUSTOMER NUMBER 026304**

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